

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

x

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)

x

This filing applies to:

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., Case No.
04-CV-05970 (RCC);

Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al.,
Case No. 04-CV-07279 (RCC);

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (RCC);

New York Marine and General Insurance Co. v. Al Qaida, et al., Case No.
04-CV-6105 (RCC);

*World Trade Center Properties LLC, et al. v. Al Baraka Investment and
Development Corp., et al.*, Case No. 04-CV-07280 (RCC).

**DECLARATION OF OMAR T. MOHAMMEDI
IN SUPPORT OF DEFENDANTS WORLD ASSEMBLY OF MUSLIM YOUTH IN
SAUDI ARABIA AND WORLD ASSEMBLY OF MUSLIM YOUTH
INTERNATIONAL'S MOTION TO DISMISS THE PROPERTY DAMAGE
COMPLAINTS**

I am an attorney licensed to practice in the Southern District of New York. I am with the Law Firm of Omar T. Mohammedi, LLC, counsel to the World Assembly of Muslim Youth in Saudi Arabia ("WAMY S.A.") and the World Assembly of Muslim Youth International ("WAMY USA"). I submit this declaration to transmit to the Court the following documents submitted in support of WAMY S.A.'s and WAMY USA's Motion to Dismiss the consolidated Property Damage Complaints.

1. For purposes of this motion, our clients will be responding to plaintiffs' allegations as if alleged against both WAMY S.A. and WAMY USA, even though plaintiffs fail to make that distinction. For the sake of brevity, any reference that we make to "WAMY" is a reference to both WAMY S.A. as well as to WAMY USA unless otherwise specified.
2. Exhibit A is a copy of a letter, along with the translation certification, sent by the former Secretary General of WAMY S.A., on behalf of WAMY S.A., to Adel Batterjee.
3. Exhibit B is a copy of the Declaration of Dr. Adel Batterjee. This is the same declaration filed on or about April 9, 2005 by attorney Ashraf Nubani in his Motion to Dismiss the Burnett v. Al Baraka action.
4. Exhibit C is a copy of the Declaration of Dr. Saleh Al-Wohaibi, Secretary General of WAMY S.A., endorsed on November 19, 2005. This Declaration includes

additional statements to the Declaration endorsed on November 1, 2005. Defendants hereby incorporate Exhibit C to address property damage and personal injury motions to dismiss under all applicable MDL 1570 actions.

I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/
OMAR T. MOHAMMEDI

Dated: November 21, 2005